

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

LAUREN F. SILVER
Assistant Corporation Counsel
Phone: (212) 356-2507
E-mail: lasilver@law.nyc.gov
E-mail and Fax Not For Service

February 12, 2024

By ECF

Honorable Denny Chin
U.S. Court of Appeals for the Second Circuit
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

MEMO ENDORSED

Re: Pitre v. City of New York, et al., 18-CV-5950 (DC)

Your Honor:

We are Assistant Corporation Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, attorney for Defendants in the above-referenced action. We write, with Plaintiff's consent, to request an extension of the briefing schedule set by Your Honor's Memorandum and Order dated January 29, 2024 on Docket #138. Specifically, we request the following deadline extensions:

- i. Plaintiff and Defendants motions extended from February 16, 2024 to March 1, 2024;
- ii. All opposition papers extended from March 1, 2024 to March 15, 2024; and
- iii. All Reply papers extended from March 8 to March 22, 2022.

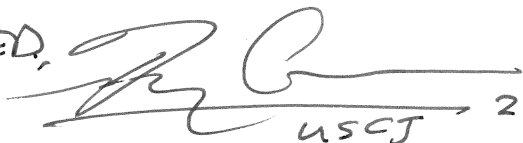
The reason for the instant request is that the undersigned attorneys have many other professional obligations in the month of February.¹ Many of which were previously adjourned to accommodate participation in the *Pitre* trial.² Additionally, Maria DeCastro, who also served as

¹ Ms. Silver is currently preparing for a multiple week trial that begins mid-march in the Southern District of New York in the matter of *Adams-Florres v. City, et al.*, 18-cv-12150 (JMF), has discovery responses due in multiple matters, and has a mediation and multiple court conferences for other matters.

² Ms. Alexander is preparing witnesses for a trial scheduled to commence on March 4, 2024, in the matter of *Colon v. City, et al.*, 16-cv-04540 (VSB) (OTW), has expert depositions scheduled for February 20, 21, and 22 as well as expert discovery due in the matter *Ahmad v. NYU Langone et al.*, 22 cv 1248 (GWG)

APPROVED.

SO ORDERED.


USCJ 2-14-2024

a member of the trial team, will shortly be departing the law department and has other obligations to attend to prior to her departure.³

We thank the Court for its attention in this matter.

Respectfully Submitted,

s/ Lauren F. Silver

Lauren F. Silver
Assistant Corporation Counsel

s/ Desiree Alexander

Desiree Alexander
Assistant Corporation Counsel

cc: Counsel of Record (By ECF)

(JLR) by March 1, 2024, has a motion to dismiss due on March 1, 2024 in the matter of *Simon v. DOE, et al* 23-CV-7796 (EK) (CLP), has a motion to dismiss on *Glowatz v. City et al.* 159914/2023 due February 23, 2024 has opposition and reply papers due February 15, 2024 in the matter of *Caiaccia v. DOE, et al.*, 158238/2023, and an Answer to the Complaint due February 23, 2024 on *Saint-Jean v. City et al.* 158748/2023.

³ Ms. DeCastro has a motion for summary judgment reply due February 26, 2024, has multiple court conferences, and has an opposition to motions *in limine* due February 23, 2024.